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FILED
HARRISBURG, PA

MAY 8 1 2002

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

MARY E. D'ANDREA, CLERK
Per 918
Deputy Clerk

CINDY L. RIGG, :
Plaintiff : CIVIL ACTION NO.: 4:CV-01-0967
vs. : JUDGE RAMBO
COUNTY OF DAUPHIN, :
DAUPHIN COUNTY SHERIFF'S :
DEPARTMENT and : JURY TRIAL DEMANDED
RALPH McALLISTER, :
Defendants :

DEFENDANTS, COUNTY OF DAUPHIN AND
DAUPHIN COUNTY SHERIFF'S DEPARTMENT
CONCURRED IN MOTION TO FURTHER
REVISE CASE MANAGEMENT ORDER

AND NOW, come Defendants, County of Dauphin and Dauphin
County Sheriff's Department, by and through their attorneys, Lavery,
Faherty, Young & Patterson, P.C., and file this Concurred in Motion to

Further Revise Case Management Order and in support thereof, aver as follows:

1. Plaintiff, Cindy L. Rigg, initiated this civil action by filing a Complaint against Defendants, County of Dauphin, Dauphin County Sheriff's Department and Ralph McAllister.

2. On February 11, 2002, Plaintiff filed an Amended Complaint in accordance with this Honorable Court's December 11, 2001 Court Order.

3. On March 6, 2002, Moving Defendants filed a Motion to Dismiss Plaintiff's Amended Complaint which is pending for adjudication before this Honorable Court.

4. On April 1, 2002, this Honorable Court issued a Revised Case Management Order directing, in pertinent part, that the deadline for completion of discovery be extended until May 31, 2002 and that dispositive motions and supporting briefs shall be filed no later than June 14, 2002.

5. Due to unavoidable scheduling conflicts, the parties were unable to complete the deposition of Sheriff Lotwick prior to the May 31,

2002 discovery deadline. Sheriff Lotwick is an important fact witness with respect to the claims and defenses asserted in this matter.

6. Moving Defendants, with the concurrence of all parties, respectfully request that this Honorable Court extend the deadline for completion of discovery until June 14, 2002 for the limited purpose of completing Sheriff Lotwick's deposition.

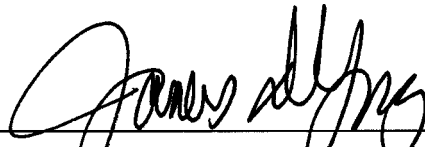
7. Moving Defendants, with the concurrence of all parties, also respectfully request that this Honorable Court further revise the Case Management Order to extend the deadline for filing dispositive motions and supporting briefs until June 28, 2002.

8. The requested extensions of time are relatively brief in duration; they will not prejudice any party's substantive rights; and they will not unduly delay the adjudication of this matter on the merits.

WHEREFORE, Defendants, County of Dauphin and Dauphin County Sheriff's Department, respectfully request this Honorable Court grant their Concluded in Motion to Further Revise Case Management Order and enter the accompanying Order.

Respectfully submitted,

Lavery, Faherty, Young &
Patterson, P.C.

By:  _____

James D. Young, Esquire
Atty No. 53904

225 Market Street, Suite 304

P.O. Box 1245

Harrisburg, PA 17108-1245

Attys for Defendants,

County of Dauphin and Dauphin

County Sheriff's Department

DATE: 5/31/02

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DEPARTMENT and	:	JURY TRIAL DEMANDED
RALPH McALLISTER,	:	
Defendants	:	

CERTIFICATE OF CONCURRENCE

I, James D. Young, Esquire, do hereby certify that I have obtained the concurrence of Spero T. Lappas, Esquire, counsel for Plaintiff, and E. Ralph Godfrey, Esquire, counsel for Defendant McAllister, in the attached Motion to Further Revise Case Management Order.